

Snyder, Terri

From: Snyder, Terri
Sent: Monday, March 31, 2003 9:59 AM
To: Casters; Melters; English, Mike; Zalota, Stanley
Cc: Ford, Dennis; Harris, Randolph
Subject: S-C

**STOP CARDS PLEASE!!!!!!!!!!!!...THANK
YOU,TERRI**

Snyder, Terri

From: Snyder, Terri
Sent: Wednesday, March 12, 2003 9:15 AM
To: Casters; Melters; Rineer, Jim; Zalota, Stanley; Blauvelt, Jeff; Yashchenko, Vadim
Cc: Ford, Dennis; Harris, Randolph; Gimmy, John
Subject: ISO's

Importance: High

Good Morning,

At the request of upper management , (CitiSteel has requested I get more forceful) that anyone that has in their possession an ISO Procedure (which I keep track of) is to move it along!

Review it , revise if needed , sign it and PLEASE return it directly back to me, I will take care of it from there.

In this email I am not mentioning no names , but from this day forward I will be. Many, many times I have asked all of you at one time or anotherare you done? where is it? did you loose it? should I re-print it for you?from some I got feedback such as I am working on it , I will bring it tomorrow and you dont. For some you tend to them well , which is something others need to work on.

A few of you were submitted a procedure or a few to pass on to one of your employees , would you please touch base with them and see how things are coming along.

ISO Procedures are mandatory as we all know , so let's get them going!

Thank You All For Your Time and Cooperation as a Team Player,
Terri

Snyder, Terri

From: Snyder, Terri
Sent: Monday, January 27, 2003 1:15 PM
To: Casters; Melters; Rineer, Jim; Zalota, Stanley
Cc: Gimmy, John; Harris, Randolph
Subject: ISO PROCEDURES

Importance: High

This is a reminder (which you all may have received an individual email already..."several times") that upper management does not want anyone sitting on any procedures....we are going to get audited shortly, so please get in touch w/me if you are unable to locate a procedure, do not be shy as many people has had to have them re-printed, but I must get some kind of feedback from you to know exactly where we stand with each one.

PLEASE DO NOT IGNORE ME.....I AM ONLY TRYING TO DO MY JOB.

Thank You All For Your Time & Cooperation,
Terri

B- 0053

P-0282

Snyder, Terri

From: Snyder, Terri
Sent: Tuesday, April 01, 2003 10:08 AM
To: Melters; English, Mike
Subject: ENGLISH

Importance: High

Mike,

PLEASE.....place 6 stop cards on my desk...they are located in the bottom draw of the file cabinet behind my chair.

THANKS,

Terri

*(Mike) He stated
he is not turning
any in!*

Snyder, Terri

From: Melters
Sent: Wednesday, March 19, 2003 8:10 AM
To: Snyder, Terri
Subject: RE: STP CRDS

what ever!!!!!!!!!!!!

-----Original Message-----

From: Snyder, Terri
Sent: Wednesday, March 19, 2003 7:17 AM
To: Casters; Melters; English, Mike; Rineer, Jim; Zalota, Stanley
Cc: Ford, Dennis; Harris, Randolph
Subject: STP CRDS

Good Morning,

This is a reminder that 2 stop cards per Supervisor is 'suppose' to be turned in weekly , as well as crew meeting forms.

Also I would like to thank Mr. Rineer for being so prompt.....Thank You!!!!

Thank You All for complying with the request of Citisteel, Terri

*which
I never
get*

(as crew meeting)

P-0271

Snyder, Terri

To: Rineer, Jim; Zalota, Stanley
Cc: Ford, Dennis; Harris, Randolph; Gimmy, John
Subject: iso's
Importance: High

Mr. Rineer & Mr. Zalota,

Several times prior to this email I have requested not only by email , but in person for the two of you to please turn in the procedure(s) you(s) have had for months now. Here I am again requesting for you(s) to turn in to me what you have.

On 3/20/03 & 3/21/03 I received several folders consisting of ISO's to be passed on and / or revised , due to the week of 3/23/03 being shutdown and I was laid off I am just now getting to them as of today, but I am starting with ISO 2796 that was handed to me today for immediate attention. I will continue to work on them and pass them along everyday after my daily tasks.

It would be appreciated if we all could work together as a team and review , revise and / or sign , and pass them directly back to me A.S.A.P. ISO procedures need to be tended to and not ignored , so please be understanding of this email and keep them going.

FYI - procedures 2795 , 2785 & 2776 will be copied on to Citisteel professional paper by tomorrow and 13 copies of those 3 procedures will be distributed into all Procedure Manuals.

Also as a reminder to all that at the request of Mr. Gimmy I am not to make 13 copies and distribute into 13 books only 1 procedure, he prefers that I wait until I have several. Since I have worked here I have complied with his request and I will continue to do so until informed otherwise by upper management.

Thank All For Your Time & Understanding,

Terri

P-0265

Snyder, Terri

To: Rineer, Jim; Melters; Zalota, Stanley; Casters; Hicks, Joe; Spectrometer Tech; Scalehouse
Cc: Ford, Dennis; Harris, Randolph; Gimmy, John
Subject: M.P.M

Importance: High

FOLLOWING IS A MESSAGE IN REGARDS TO THE (white binder) MELTSHP PROCEDURES MANUAL:

Mr. Gimmy ,
In your mailbox you will find 2 TOC and a set of updated procedures to go in your book.

Mr. Rineer,
I will be down around 2pm today to update yours, would you be so kind as to leave it on your desk as always?

Melter,
Will you please bring your book over the very next time you come?

Caster Sup.,
Will you or will you please send someone with the Caster & Stir Station book the very next time one is coming over?

Mr. Zalota,
If you would be so kind as to bring your book your very next trip over, even if it isnt until tomorrow morning?

Mr. Hicks,
Would you bring your book your very next trip over please?

Spectrometer Tech,
Also if one could be so as to bring the book from your office as well?

Scalehouse,
If one still knows the location of the book in the scalehouse please bring it over also?

As for Ford, Harris & My book they are being updated shortly.

Please keep in mind ALL BOOKS need to be updated as requested , so please be understanding and work with me.

Thank You All For Your Time,
Terri

P-0266

Snyder, Terri

From: Snyder, Terri
Sent: Monday, March 31, 2003 9:15 AM
To: Melters
Subject: joslyn

Rich,

Please enter your hrs for last wk (# 13) March 23rd through March 29th.

Let me know when you have taken care of this and I will print you separately under hrs verification rppt and staple it to the back of 6900 timesheet.

Thanks, Terri

P-0269

Snyder, Terri

From: Snyder, Terri
Sent: Wednesday, January 15, 2003 11:16 AM
To: Melters; Casters
Subject: 2788 & 2789 JOSLYN

I need to speak to you tom. morning...2788 & 2789 ISO's were placed in your box w/start up on 10/22/02...will you please try to locate or do I need to reprint???....Let me know either way.

Thanks, Terri

Snyder, Terri

From: Snyder, Terri
Sent: Wednesday, August 28, 2002 10:21 AM
To: Balan, Edgar; Buragino, Greg; Ford, Dennis; Harris, Randolph; Rineer, Jim; Yashchenko, Vadim; Zalota, Stanley
Cc: Gimmy, John
Subject: ISO PROCEDURES

Good Morning Gentlemen....this is a reminder that the ISO man will be here on 9/16/02. We must get as many out in the books as possible....so please continue to keep them moving right along.

At the request of Mr. John Gimmy & Upper Management I am to start distributing them by 9/04/02....so please let's work together and pass back what you do have, if any.

Thank You All For Your Time & Cooperation, Terri

B-0060

Snyder, Terri

To: Melters
Cc: Patrone, Carmella; Harris, Randolph
Subject: DATA

Importance: High

THIS EMAIL IS TO INFORM YOU ALL THAT STARTING TOMORROW AT THE REQUEST OF ONE OF MY SUPERVISORS (HARRIS) WHENEVER A CORRECTION IS TO BE MADE IN CITIPRO I WILL BE TAKING CARE OF IT , AND IT WILL BE MY PLEASURE IN ASSISTING FELLOW CO-WORKERS IN LOWER THEIR WORK LOAD , BUT ALSO AT HIS REQUEST HE WOULD LIKE FOR A MELTER TO REVIEW THE ADJUSTMENTS I MAKE ACCORDING TO THE DATA RECORDED ON THE HEAT SHEETS.

SO ALL WILL CONTINUE TO RECEIVE AN EMAIL IN REGARDS TO CHANGES , BUT NOW IT WILL BE JUST TO INFORM YOU OF THE CHANGE I MAKE AND NOT A REQUEST FOR A CHANGE TO BE MADE , SO PLEASE COMPLY WITH OUR SUPERVISORS REQUEST TO DOUBLE CHECK MY WORK JUST AS I WILL COMPLY WITH HIS REQUEST IN THE CHANGE OF WHOM IS TO ADJUST THE DATA IN CITIPRO , JUST AS I ALREADY DO IN STANDARD.

THANK YOU ALL SO MUCH FOR YOUR TIME AND YOUR COOPERATION, TERRI

P-0281

3/12/03

Snyder, Terri

To: Ford, Dennis; Blauvelt, Jeff; Patrone, Carmella
Cc: Harris, Randolph
Subject: inv issue

Good Morning To All,

I think we should get together and discuss INVENTORY ISSUE'S...such as being more organized , data recordings and data entry accuracy...along with the receipts. I recall this being mentioned during this last inventory and the longer we put it off the more it is going to be an ongoing problem (like I heard it has been LONG before I started working here) and run right into this month - end.

So I am not asking I am demanding that we get this under control , so therefor we need to get together so we can MAKE IT HAPPEN!!

Meetings are held for many things here , at times MINOR , and I feel as I am sure you all feel inventory is NOT MINOR , it is of GREAT IMPORTANCE...so if I could please get some feedback from ALL of you to decide on a date and time for our meeting....at least 1 or 2 days in advance notice would most definately be best for us. One more thing, either a Melter Supervisor be included in the meeting or the General Supervisor can meet with them soon after our meeting to discuss recordings of consumption , after all that plays a big part in the inventory.

Thank You So Much For Your Time and Cooperation,

P-0277

Snyder, Terri

From: Harris, Randolph
Sent: Sunday, March 09, 2003 2:32 PM
To: Snyder, Terri; Melters
Cc: Patrone, Carmella
Subject: RE: DATA

Melters,

Please review the changes and confirm. We will try this for at 2 weeks and review if its working. Terri is trying to help lighten your work load. I need you to review and make this happen. Neal make sure YOU participate.

Thanks
Randolph

-----Original Message-----

From: Snyder, Terri
Sent: Sunday, March 09, 2003 2:24 PM
To: Melters
Cc: Patrone, Carmella; Harris, Randolph
Subject: DATA
Importance: High

THIS EMAIL IS TO INFORM YOU ALL THAT STARTING TOMORROW AT THE REQUEST OF ONE OF MY SUPERVISORS (HARRIS) WHENEVER A CORRECTION IS TO BE MADE IN CITIPRO I WILL BE TAKING CARE OF IT , AND IT WILL BE MY PLEASURE IN ASSISTING FELLOW CO-WORKERS IN LOWER THEIR WORK LOAD , BUT ALSO AT HIS REQUEST HE WOULD LIKE FOR A MELTER TO REVIEW THE ADJUSTMENTS I MAKE ACCORDING TO THE DATA RECORDED ON THE HEAT SHEETS.
SO ALL WILL CONTINUE TO RECEIVE AN EMAIL IN REGARDS TO CHANGES , BUT NOW IT WILL BE JUST TO INFORM YOU OF THE CHANGE I MAKE AND NOT A REQUEST FOR A CHANGE TO BE MADE , SO PLEASE COMPLY WITH OUR SUPERVISORS REQUEST TO DOUBLE CHECK MY WORK JUST AS I WILL COMPLY WITH HIS REQUEST IN THE CHANGE OF WHOM IS TO ADJUST THE DATA IN CITIPRO , JUST AS I ALREADY DO IN STANDARD.

THANK YOU ALL SO MUCH FOR YOUR TIME AND YOUR COOPERATION, TERRI

Snyder, Terri

From: Melters
Sent: Monday, March 17, 2003 2:44 AM
To: Snyder, Terri
Cc: Harris, Randolph
Subject: Time Missed

Please at your earliest convenience I would like a year to date report for Harry Brooks and Bob LaRue, # 562 and # 375.

Thanks
Rich Joslyn

Handwritten notes in the top right corner of the page, written diagonally across the header area, include:
"I have afforded (RTH)"
"Following"
"trying"
"in my office"
"I know I"
"helped it"
"substantially"
"He always laughs at me"
"after you know me"
"I can't make it"
"he states that"
"he looks paranoid"
"he must stop his salary"
"one of same long"
"look at, also wanted"
"Randolph"
"to be the only place"
"the guys"
"go to his job"
"sheet & runs"
"for shutdown work"
"3/23-3/24"

B-0064

P-0273

Handwritten notes at the bottom of the page, written horizontally, include:
"March 21, 2003 - Ford found Hanis hanging over me - He said leave her alone - she is doing something for me - telephone list I said why don't you fire me if you are scared I am gonna tell ya"
"He said, 'You light up my days'"
"You light up this office"
"He said"

Snyder, Terri

From: Snyder, Terri
Sent: Tuesday, April 01, 2003 1:38 PM
To: Rineer, Jim; Zalota, Stanley
Cc: Ford, Dennis; Harris, Randolph; Gimmy, John; Buragino, Greg
Subject: iso's

Importance: High

Mr. Rineer & Mr. Zalota,

Several times prior to this email I have requested not only by email , but in person for the two of you to please turn in the procedure(s) you(s) have had for months now. Here I am again requesting for you(s) to turn in to me what you have.

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Thank All For Your Time & Understanding,

| Terri Tracking: | Recipient | Delivery | Read |
|--------------------|------------------|-----------------------------|------------------------|
| | Rineer, Jim | Delivered: 4/1/2003 1:38 PM | |
| | Zalota, Stanley | Delivered: 4/1/2003 1:38 PM | Read: 4/1/2003 1:39 PM |
| | Ford, Dennis | Delivered: 4/1/2003 1:38 PM | |
| | Harris, Randolph | Delivered: 4/1/2003 1:38 PM | |
| | Gimmy, John | Delivered: 4/1/2003 1:38 PM | |
| | Buragino, Greg | Delivered: 4/1/2003 1:38 PM | Read: 4/1/2003 1:38 PM |

B- 0065

P-0264

Snyder, Terri

From: Patrone, Carmella
Sent: Wednesday, March 12, 2003 12:49 PM
To: Snyder, Terri
Subject: Misc....

Okay finally can breathe a little bit. I figure I'll write back while waiting for the reports to finish printing (it's a long one).

Anyway, I didn't read your email carefully the first time. I thought you said "they" said I came up to them and complained about your job performance. I didn't read carefully that it was Greg who went around asking everyone about you. That part is true, he did ask me that about a week ago but I know I didn't say anything that indicate you weren't doing your job. Greg wanted to know if you were doing everything you were supposed to do and I told him that you're doing everything that you can do under the circumstances and the example I gave him was that it was difficult for you to complete the alloy/flux usage verification before 7:30 am because of other responsibilities you had like Iso's and other morning reports. I also said that you don't get the Melter's report till after 7:30 am. I told him that I felt you were given too much responsibilities that makes it hard for you to try to meet certain deadlines. Also, you can't do your job if other people don't provide you with the necessary information you need, for i.e. physical inventory #'s.

Greg didn't ask specifically about the morning reports, that was just an example I gave to him to make him understand that it wasn't "you" but rather the "various responsibilities & deadlines" "they" demanded on you was the issue but I guess he didn't interpret it that way. But that's not a problem, I have no problem whatsoever in going to Greg and straighten that out but I won't go against your wish. If you don't want me to say anything because you feel they might hold that against you, I will respect your wish. But anytime you need me to straighten this out just let me know and I'll do it.

Of course the other problem is that I'm also holding you back with not staying on top of training you with Std Cost like giving you updated Vendor's code and training you with the new meltshop supplies program so that's my fault, not yours and I will point that out when we have that meeting. I told Jeff and Dennis this but I don't recall ever telling Greg about it. Greg and I didn't even talk more than 2 minutes, that's how brief it was. Now I wish I had taken the time to elaborate more. I thought he was asking because he was trying to find a way to improve the workload. Had I known it was to try to find fault in your job performance, I would have made it clear that I was certainly happy with what you've been doing. Actually, you have been doing a lot more than before that's for sure. I'm actually annoyed with myself for not thinking this one through.

Let's definitely do lunch on Friday so we can talk about this in details. Also, we might as well take advantage of outlining notes and issues to discuss when we do have that inventory meeting. Does that sound good to you? This would be a good opportunity for me to set the record straight about your job performance cause I can point out "their" problems and not your's. The storeroom receipts of course is still an issue which you did point out. Good thing I saved a bunch of them to show them so they know we're not just making this up. Till we meet on Friday, do whatever you have to do to "cover your butt", even if that means you have to send me "formal" emails with "cc" to everyone else, that's fine with me, got no problem with that.

cause of a cat

By the way, since they're giving you a hard time about coming over here, that's no problem...I'll just come up to your office instead when I'm ready to train you with the supplies in Std Cost. Okay with you?

Rats, gotta get back to work. The reports are doen and got to get them ready for Allen.

Hope you're feeling a little bit better. I could tell on the phone yesterday that you were very upset and were crying.

Talk to you later.

-----Original Message-----

From: Snyder, Terri
Sent: Wednesday, March 12, 2003 7:59 AM
To: Patrone, Carmella
Subject: me

Good Mooooornnniiinnngg YOU,

B- 0066

P-0223

Page 1 of 2

Tuesday April 8, 2003

I, Terri L. Snyder have finally taken proper steps to inform CitiSTEEL of the sexual harassment I have been going through due to the actions and behavior of Mr. Randolph Harris. Mr. Harris has been saying and doing the following for a period of time... walks in my office rubs my cheek and says how pretty, runs his hand down my hair and will tell me how it looks good, Mr. Harris has asked me to come to work on a Saturday (which was suppose to be the upcoming Sat. that would of been 1/11/03) wearing a dress w/no panties and dashes out laughing. Mr. Harris has asked me out many times. Mr. Harris will sometimes stand in my doorway (if no one is around) and just stare at me with this little smug grin on his face. Mr. Randolph Harris asked me

B-0067

P-0071

continues on next page

4-8-03
 They (Dante) said I can pick whoever I want is
 the meeting is the morning ... 4-9-03 he
 denied saying that when I said where have you
 been hiding Landolt for the past 3 hrs?
 None of my business ... every thing
 was none of my business, I informed
 him my Father lives in New Jersey
 and he will be here tomorrow between
 1-2 PM and this so called "Proper" meeting
 (Thursday) 4-10-03
 needs to be scheduled until tomorrow, so I
 terminate this conversation until tomorrow.
 He (Dante) said why is your Father
 coming here I said because I need a
 witness someone on my side, He said
 I don't want to meet your Father,
 I said you can meet my Father or
 you can meet a lawyer he responded
 back immediately I will meet
 your Father ... I said what he says I will
 let you know ... I said ~~by then~~ when? ... he said
 by the end of the day ... That's when he followed me

P-0055

B-0068

MAY-09-03 03:51 PM CITISTEEL HR

DATE April 8, 2003
TO: Record to file of Randolph Harris
FROM: J. Downie
SUBJECT: Meeting with Randolph Harris

Following a meeting with Terri Snyder, Greg Buragino and I met with Randolph Harris at 3:45 pm to discuss allegations by Terri Snyder that he, Randolph, had sexually harassed her.

Randolph stated that he never asked her out, touched her or called her on the phone and apologized to her for anything. He was emphatic about it.

We asked Randolph if she and he ever discussed anything that anyone would consider improper and he said no. He did say that she brought up to him one time about some kind of a party she was going to and that they wore only bed sheets. He said that he changed the subject. He also stated that for the past several months she was angry with him because he was involved in a group decision to write her up for poor attendance and poor work performance and that she had to be verbally warned on several occasions.

We advised Randolph that he should not speak to Terri or anyone else about this matter and to use care in communicating with her during the course of business the next morning during which we would speak to her again.

The meeting ended about 4:35 p.m.

B-0069

D378

On 4/8/03 Mr. Jerry Downie w/ Greg Buragin
present is offering several options
in how to handle the sexual har.

They want to know if I will feel
comfortable still working in that department w/ his
presence. ~~I informed them~~ File charge
Employment

→ Yes,
I can
report to
my other
Supervisor
Ford - I
am staying
and want
to continue
my job -

Ms. Smith

M-F

8:30 - 4 PM

Ms. Smith

DISCRIMINATED
215 440-2605
6900 6

21 South 5th St.

95 North - Independence Hall Exit

I will be on 4th continue
2 blocks
Race St. Cherry St, Arch St

St, Market, Bourse

4th floor - Walk through
food court - Elevator 4th floor
see Reception

on the 9th
I said make
him transfer

Snyder, Terri

From: Snyder, Terri
Sent: Monday, April 07, 2003 2:29 PM
To: Patrone, Carmella
Subject: RE: me

dont forget to delete

-----Original Message-----

From: Patrone, Carmella
Sent: Monday, April 07, 2003 2:27 PM
To: Snyder, Terri
Subject: RE: me

Hi Terri,

Hey stop aplogizing. I certainly did not feel uncomfortable at all. You can pour out your problems anytime you need to. I certainly understand what you're going through. Hopefully we'll figure out something to do about it tomorrow night when we get together okay.

Till then just take it easy and try to hold on till tomorrow night. See ya later.

Carmella

-----Original Message-----

From: Snyder, Terri
Sent: Monday, April 07, 2003 2:19 PM
To: Patrone, Carmella
Subject: me

Carmella,

I need to apologize for pouring my problems out on you....especially today but it was hard holding back the tears, i know they built up in my eyes and i am sorry this is not the place and it is not your problem...i am the type of person not to hold things in , and i quess you have made me feel so comfortable and also as a person not just a co-worker that i figure i can let it all out on you and i shouldnt do that....i am sorry if i make you feel uncomfortable when i come crying , wining , complaining ...whatever you want to call it to you....i should of done something about it as soon as it began which was my second day here , but then again I was not an employee with Citi , i came in through a temp agency....i figured i was a nobody and also , i wasnt a real employee ...who is going to believe me....also i figured it would stop....NO means NO....I thought Randolph would realize NO she is not gonna go out with me....NO she doesnt want me to bother her....you said you would have done something sooner and more professional , well it is alot different done here and I was giving him the chance behave professionally....I asked him over & over to leave me alone....I told him way to many times I am not going out with him....and to this day it all continues...I have had enough....Carmella, plus I never wanted to see anyone fired nor did I want to be on channel 6.....get my drift....I just want(ed) to be able to come to my cute, little, dusty job and go home happy....but that seems to be impossible working here with/for Mr. Randolph Harris as my boss....I trust you and I believe you are the person you have shown me you are....I believe I have seen your true colors.....Thank You For Being You...Thank You For Being Real....again I am sorry....I will be up shortly w/blue folders.

Thanks,
 Terri

B-0071

4-9-03 Wed.

On the 9th after they
(Mr. Downie & Mr. Ryan) came
to the hill cause I had
to drop off a BCR to Carnell
and they asked me in
his office - Begging me to
at least take the rest of
the day off to consider
his offer - I other things
that were said was -
There's some dust has
risen and we want to
get the dust down - I
said I will bring dust
down and keep it if
you give me what I want

B-0072

P-0832

② I said we
wouldn't be here
having to go through
this if that man
didn't sexually harass
me continuously the
way he has and ~~he~~
I warned him many
many times, Mr. Towne
said, "We know you have."
Then why in the hell
haven't you done anything
to help me - instead
of hiding and protecting
~~me~~ him? I have gotten no answer

B-0073

P-0833

1 MS. SNYDER: Mr. ^{Jerry}Downie^{Terri}; I, MS. SNYDER, and ~~Mr. J. Ryan~~ ^{Mr. J. Ryan}

2 MR. DOWNIE: Oh, you want to tape this conversation.

3 MS. SNYDER: Oh, yes ^{and} in writing and plus I have a few questions.

4 MR. DOWNIE: I don't want to be taped. I'm sorry.

5 MS. SNYDER: Why? ~~that~~

6 MR. DOWNIE: I just don't want to be taped. ~~that~~

7 MS. SNYDER: Well, why not?

8 MR. DOWNIE: I just don't want to be taped ^{Terri}.

9 MS. SNYDER: Well, I wanted ^{see Randolph} ~~to~~ ^{House} and know where you were hiding

10 yesterday and I asked you why you wanted to transfer me. You wouldn't answer none of them

11 questions. So I should be allowed to do this. ^{I've already} ~~been~~ ^{been} informed of all my rights.

12 MR. DOWNIE: I don't want to be taped.

13 MS. SNYDER: [inaudible] ^{okay - do you have papers for me to sign?} ~~you want~~ ^{is that what they are?}

14 MR. DOWNIE: No.

15 MS. SNYDER: You want me to turn this off?

16 MR. DOWNIE: Yes, please.

17 [Background Noise - Inaudible] ^{noise} ^{Jerry Downie} ^{what} ^{to please transfer is so that everyone who is ever} ^{TD - it's the tape recorder on? TS - yes it is. can be protected.}

18 MR. DOWNIE: ^{TD - it's the tape recorder on? TS - yes it is. can be protected.} ^{okay - Bottom line is you have the recorder on,} ^{Oh anyway} ^{... and since the tape recorder is on right now I object to being}

19 recorded and we discussed that earlier. I don't want to be recorded.

20 MS. SNYDER: Well I would like to know why I can't have it ~~ready~~ ^{in writing} why you

21 ^{want me to transfer} ~~And I am not~~ ^{resigning} office and unless I get ~~assigned~~ ^{it in writing} I am not accepting

22 a transfer. ^{I am going back to my office}

23 MR. DOWNIE: ^{okay Terri} I am trying my darndest to be calm _____

1 MS. SNYDER: You're being calm, I'm being calm.

2 MR. DOWNIE: We both are, ok. But here's another thing I got permission to do.

3 You're written up in the *Melt Shop T.S. That Fine*
is that rite? 70. OKAY

4 MS. SNYDER: Which was a lie.

5 MR. DOWNIE: *for* Poor work performance.

6 MS. SNYDER: He never produced proof of that. *DF* told me Randolph
70 EXCUSE ME TS EXCUSE ME I was talking

7 Harris' idea. Randolph came to me soon after and ... I apologize for having to do that because I

8 needed to show you who has authority. Randolph was mad and angry that's why I refused to

9 sign it. If I do something wrong I admit it. I have no problem signing it. But that has nothing to

10 do with the sexual harassment charge I filed on the 8th. *70-OKAY*

11 MR. DOWNIE: *AH* Yesterday... *you asked*

12 MS. SNYDER: Yesterday after you two followed me around?

13 MR. DOWNIE: Excuse me, I didn't follow you around.

14 MS. SNYDER: You followed me up *to the main Building*

15 MR. DOWNIE: No, I didn't follow you *around*

16 MS. SNYDER: Yes you did. *CP* is a witness to that.

17 MR. DOWNIE: Well she can be a witness. I didn't follow you around.

18 MS. SNYDER: Yes, you did. *Begging me to leave*

19 MR. DOWNIE: I didn't... *follow you*

20 MS. SNYDER: Begging me to leave for the rest of the *day* ~~leave~~.

21 MR. DOWNIE: I did not follow you around, *up there*

22 MS. SNYDER: You didn't? Well how did you end up there and how did *you* end up in

23 your office again?

B-0075

1 MR. DOWNIE: Because I had to go up to the building.

2 MS. SNYDER: Then why did you come looking for me and ask me come in and
3 talk to you.

4 MR. DOWNIE: Because no one knew where you were, ok?

5 MS. SNYDER: I had to deliver the ^{Bill of} ~~last~~ ^{gave} that I ~~have~~ her. She'll show you
6 what I ^{gave} ~~have~~ her. It's dated.

7 MR. DOWNIE: Ok. The bottom line is I am willing to...

8 MS. SNYDER: To transfer me.

9 MR. DOWNIE: To remove.

10 MS. SNYDER: Me.

11 MR. DOWNIE: ^{So the written warning}
You asked me yesterday...

12 MS. SNYDER: To remove me.

13 MR. DOWNIE: Would you let me finish? You asked me yesterday if I would
14 please remove or eliminate the written warning.

15 MS. SNYDER: I said you give me I want and I'll give you what you want.

16 MR. DOWNIE: I am ^{willing} ~~going~~ to do that because I don't know what happened. Ok?

17 We, as a company, are willing to remove the warning to give you benefit of the doubt ^{of} ~~for~~ this
^{let me finish Terri}
18 whole situation and that's...

19 MS. SNYDER: On the sexual harassment charge?

20 MR. DOWNIE: That is correct.

21 MS. SNYDER: Bring Randolph Harris here. Does he admit it? Does he deny it? I
22 want to know.

23 MR. DOWNIE: ^{Am going to}
I ~~did~~ not discuss that... ^{with you}

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1 MS. SNYDER: You didn't conduct an investigation either.

2 MR. DOWNIE: [inaudible] *I am not, yes I did.*

3 MS. SNYDER: *And* What did you come up with.

4 MR. DOWNIE: *Terr* ~~Carrie~~, *Terr* ~~Carrie~~ look.

5 MS. SNYDER: You cannot just make me transfer cause he sexually harassed me.

6 MR. DOWNIE: *Terr* ~~Carrie~~, *listen to me* please. *please*

7 MS. SNYDER: *The Harassie* should be transferred or fired, not me.

8 MR. DOWNIE: *Terr* ~~Carrie~~, please.

9 MS. SNYDER: You put it in writing and I will consider your transfer.

10 MR. DOWNIE: I am not going to put anything in writing.

11 MS. SNYDER: Why?

12 MR. DOWNIE: I am asking you, would you like to transfer to the shipping

13 department?

14 MS. SNYDER: No, I would not. I haven't done nothing wrong. I came to you like

15 your policy requests. Your policy says to report any sexual harassment. I did and look what

16 *TO - OKag, OKag*
you're trying to do to me.

17 MR. DOWNIE: I'm not trying to do anything.

18 MS. SNYDER: You're trying to terminate. You're trying to voluntary *oh-oh* ~~Resign~~

19 MR. DOWNIE: *TO - Terr, Terr*
Terr What I am trying to do *is give you* the company.
another opp in

20 MS. SNYDER: *D.F. is my other* immediate supervisor. I can work up

21 there for him. That's what you said to me on the 8th. Yes it is.

22 MR. DOWNIE: *Terr* ~~Carrie~~...

23 MS. SNYDER: Greg Barizino was right here and he'll verify it.

B- 0077

1 MR. DOWNIE: ~~I or we were~~ ^{trying to do} something yesterday and I'm willing to do
2 something.

3 MS. SNYDER: I said give me two pieces of paper. One, tell me why you
4 want me transferred.

5 MR. DOWNIE: I will write out a piece of paper that says I retracted the written
6 warning. I will do that. I am not. going to give you

7 MS. SNYDER: I want to know why you want me transferred. Do you want me to
8 leave ~~so you can feel~~ ground? ~~anything.~~

9 MR. DOWNIE: Yes. then

Mr. J.D. opened the door
Mr. J.D. then asked

Mr. Ryan to escort
me off the grounds

Mr. Ryan got up and
walked me out.

J.D. got up
from his desk
And walked towards
the door - that
is when/why
I asked

B-0078

Managing Diversity in the workplace

Randolph L. Harris

Principles of Management 212

Cliff Farmer, Instructor

10 November 2001



B-0079

P-0295

Managing Diversity in the workplace

Randolph L. Harris

Principles of Management 212

Cliff Farmer, Instructor

10 November 2001

B-0080

P-0296

Harris 1

Managing Diversity in the workplace

Premise:

With the changing workplace, managing a diverse workforce becomes a necessity to achieve an acceptable level of business productivity.

This paper will review the historical perspective of diversity, compare 'managing diversity' with Equal Employment Opportunity (EEQ) and affirmative action programs.

This is often confused.

The background perspective will then be applied to a 'real life' situation at Citisteel, where I am the Manager of the Melt Shop, a group of 70 people of diverse Racial, ethnic and religious backgrounds. All of these people have to work together in a highly productive manner, in a difficult industrial setting for the Company to prosper in these tough economic times.

Conclusions will be developed based on the literature and my own practical experience.

Background

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Harris 2

Workforce Supply:

The United States workforce continues to become increasingly diverse. The number of women in the labor force has grown at a much higher rate than for men. In 1970 there were 31.5 million women in the labor force – which grew to 56.6 million in 1990, a growth rate of ____ %. However for men in the workforce, the number grew from 51.2 million in 1970 to 68.2 million in 1990. (Source: US Bureau of Labor Statistics).

The National MultiCultural Institute reports that:

Through the 1990's people of color, women and immigrants will account for 85% of the net growth of the nation's labor force.

By 2000, Women will be 47% of the labor force.

Over the next 20 years the U.S. population will grow by 42 million. Hispanics Will account for 47% of the growth, Blacks 22%, Asians 18% and Whites 13%.

Miami is 2/3 Hispanic.

San Francisco is 1/3 Asian America.

Richard Templeton of Texas Instruments is quoted to say: *"Development of the future workforce is a critical issue for high technology companies. We must find ways to remain creative and innovative, and diversity of thought is fundamental to creativity".*

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Harris 3

Workforce Legislation:

The Civil Rights Act of 1866 was one of the earliest attempts to protect people of color against discrimination on the basis of race. The Civil Rights Act of 1964 (Title VII) prohibits discrimination in employment based on race, color, sex religion or national origin. This act was passed shortly after the assassination of President John F. Kennedy. The Civil Rights Act of 1991 provides employees charging intentional discrimination the Right to a jury trial and the right to recover punitive and compensatory damages. The degree of protection has grown in recent years. In addition there was Executive Order 11242 which requires employers with 50 or more employees and who have federal contracts to prepare affirmative action plans. The intent of these plans is to ensure increases in the hiring, training and promotion of people of color and women into jobs and levels where they are seriously underrepresented from the beginning, the United States has had a diverse population, racially and ethnically. Its record in regard to minorities has not been noteworthy for tolerance, in spite of American ideals of brotherhood and opportunity.

Harris 4

American Indians were dispossessed, both territorially and culturally, and even hunted down and exterminated. Blacks, kept in slavery until the mid – 1800s, were for decades systematically deprived of basic civil rights. Asian – Americans suffered arbitrary exclusion; during World War II Japanese – Americans were relocated to internment camps. Hispanics – Puerto Ricans, Mexican – Americans, and other Spanish – speaking people – found opportunities limited because of their brown skins. Jews faced anti – Semitism that kept them out of certain neighborhoods, schools, and professions. The U.S. government acted to limit the immigration of certain “white ethnics”, especially those from Eastern and Southern Europe.

Progress has been made in both attitudes and actions, as any study of the recent civil rights movement will show. There has also been a change in American values. The earlier ideal of a “melting pot” that would obliterate racial and ethnic differences has given way to an ideal of pluralism, with individual groups retaining some degree of separate identity.

Harris 5

Company and Organization policies:

Companies and Organizations have established 'diversity policies and guidelines' to reflect the policies of these organizations and to ensure compliance with the law within their organizations. Several major corporations have been heavily fined for non – compliance, which is part of the reason that companies are trying to make sure that they meet the letter of the law. Some employers take affirmative action steps, even though this is not required.

An example of an organizational policy on inclusiveness would be the 'Mission And Values Statement' of Cornell University. Cornell's statement emphasizes Open Doors, Open Hearts and Open Minds. Expanding upon, Ezra Cornell's founding statement: "*I would found an institution where any person can find instruction in any study*" to promote diversity the University has reconfirmed this enduring commitment to inclusion and opportunity which is rooted in the shared democratic values envisioned by its founders. "*We honor this legacy of diversity and inclusion and welcome all students, including those from groups that have been historically marginalized and*

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previously excluded from equal access to opportunity." (Source: Web site: Cornell University).

Also, many private companies have endorsed diversity, not only because it is fundamental in a free and democratic society, but also because it is 'good business'.

For example, Bank One (Source: web site) recognizes "*...ALL attributes that an employee brings to the workplace, including race, gender and personal attributes such as ideas and perspectives. It also acknowledges the importance of worklife balance.*"

However Bank One also believes that diversity gives them a *competitive* advantage by:

Creating an open and supportive work environment to make Bank One an 'employer of choice.'

Promoting employee development, which enhances our ability to retain employees.

Encouraging everyone to contribute, thereby increasing Bank One's Opportunity to deliver exceptional results.

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A Real Life Situation:

To put the CitiSteel Melt Shop example in perspective, the unit employees approximately 70 people of widely different gender, backgrounds religions, education and culture. The workplace is difficult factory environment with 'heavy lifting' required. The workforce of 75 is approximately 15% and 5% women.

In this difficult factory environment, it is important for all people to work well together, because anything less would seriously jeopardize the safety of individual employees. For example, a crane operator may carry 180 tons of motel steel in the air -- above where other employees are working. The careful control of cooling water in the presence steel is necessary to prevent explosions and injury.

Because not only the efficient operation of the shop is at stake, but also the lives of every employee are dependent on each employee having respect and looking out for the safety of their fellow workers.

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I have tried to instill in all employees that there is only 'one color' in our shop and that is "steel blue" (the finished product that pays the bills, including employee wages). This is important regardless of individual differences and previous prejudices.

Leadership starts by setting an example – and this I believe defines leadership vs. management. I believe that 'talking positive' is one of the best tools of motivation.

Secondly, it's important to empower employees. Empower employees to feel a sense of responsibility and accountability for their actions. This helps them make better decisions, improving the Company's performance. In addition empowerment is especially important in a three - shift factory operation, as there is limited senior supervision during the 'off shifts.' (3pm – 11pm and 11pm – 7am).

The employees also understand that it is important to work together, despite their diverse backgrounds, because their paycheck depends on it. The Company's performance system rewards all people (workers and supervision) with exactly the same percentage productivity bonus. This reward is based on meeting productivity goals.

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When it comes to their pocketbook, people understand that it can 'pay off' to work together creatively in a diverse atmosphere to accomplish a common goal. To demonstrate that this can work well, all Melt Shop employees for the period January 1st – October 31st have earned their bonus in eight of the ten months. The failure to earn the bonus in the other two months was due to equipment problems.

Conclusion:

The real life example brings home the fact that to be successful in any organization with the existing diverse workforce, one must understand 'managing diversity' as compared to just 'following the law' (as defined by EEO and Affirmative Action guidelines).

For example, managing diversity is technically voluntary, as opposed to EEO Rules, which are mandatory. Although we have seen in our example that managing diversity is '*mandatory for success*' as it focuses on productivity, efficiency and

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quality. Managing diversity focuses on changes which can be made to the business and is long term and on – going, again the positive results of people working together in a voluntary way for their common good – rather than to comply with the ‘letter of the law.’

Managing diversity also recognizes individuals for their differences and contribution and gives a perception of equality. On the other hand, Affirmative Action was born of a desire to address inequality and is not viewed as an acceptable solution by a wide (diverse) range of people.

Harris 11

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Events surrounding Terri Snyder harassment charges

described by Greg Buragino 4/10/03

Greg Buragino 4/10/03

On 4/8 at approximately 12 AM, Dennis Ford contacted me (on the cell phone) to inform me that Terri Snyder had just had a conversation with him & claimed that Randolph Harris was sexually harassing her. He asked what he/we should do next.

I told Dennis that I would contact Jerry Downie and that the 3 of us (Jerry, Dennis & I) should meet to discuss. I contacted Jerry immediately and we arranged a meeting for 1:30PM.

We met at 1:30PM in the plant personnel building. After a brief discussion with Dennis about his conversation with Terri, Dennis was asked to document what he was told by Terri. Dennis did that and then was allowed to leave.

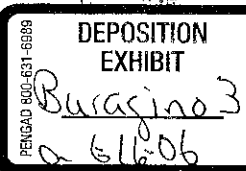
Terri was called at the meltshop and asked to come to the personnel building to meet with Jerry and I. She arrived about 1:55PM.

Jerry told her that Dennis had informed us of her complaint and that we were following up, per policy, to investigate her claim and to help.

From the conversation, these are the salient points I recall:

- Randolph has expressed an interest in her personally which she says she has rebuffed
 - Randolph has asked her if she has feelings for him
- Randolph has occasionally touched her hair or her face
- Randolph has made comments to her like "you're pretty"
- Randolph asked her to come to work with a dress and no panties
- She (claims to have) made a tape recording of Randolph apologizing for bothering her or for making inappropriate comments (note: we did not see or hear the tape)
- She said that this was going on "for months" and that she didn't want this to continue. She apologized for not bringing this up sooner and said this was wrong on her part.
- She said that she read the company policy on harassment.
- She said that she has discussed this with other employees
- She said that after she was given a written warning (by myself and reviewed with Dennis and Randolph on 2/28/03) that Randolph thanked her for not bringing up this topic (harassment) to me.
- She did not agree with the portion of the written warning which stated that her job performance was not satisfactory
- She said that Randolph did not act professionally with her but that Jerry, Dennis and I always did
- She felt that we could help her and we could get Randolph to "Stop it"
- She said that she didn't want Randolph to be fired or hurt but that she just wanted him to admit that he was doing this and that he should stop ... as long as he stopped, she would be satisfied and she would not want to pursue this any further
- She liked her job and her "dusty little office" and when asked if she would be uncomfortable still working around/near Randolph, she said that she would not
- When informed that "relocation" was one possible option, she said that she didn't want another job

Terri was asked to make a written summary statement and to sign and date it. She seemed hesitant at first to put this in writing. She claimed that she kept a diary (we did not see), which documented events in her life. We asked several times for her to try and "summarize" the problem and list a few examples. She was given some paper and a pen.



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Jerry left the room for a few minutes and she repeated to me several of the points above. I continued to encourage her to write down those things she was telling us or any other things which were bothering her and want.

I then left the room to allow her to write her comments.

Jerry and I returned to the room and Terri had completed 2 pages of summary. She was allowed to make a copy for herself.

We expressed to her that this would be given a high priority for investigation and that we took this matter very seriously. She was then allowed to leave.

Jerry contacted Randolph via cell phone (Randolph was at jury duty this day) and Randolph agreed to come into the plant for a meeting at approximately 3:45pm.

Jerry and I met with Randolph and discussed the claims that Terri had made.

We asked Randolph if any part of her claims were true. Randolph said that these claims were not true.

Other points made by Randolph are listed below:

- He says that he never intentionally touched her face or her hair (other than bumping up against her in the course of reviewing work)
- He says that he does not recall having any conversation with her on the phone (at her home) other than related to her working schedule
- He does not recall ever asking her to wear a dress or not to wear panties
- He says that she would occasionally discuss her own personal life outside of work with him (at work) but that he did not initiate these conversations. Some of these conversations may have had a "sexual" tone (i.e. he says she talked about "picking up men" or attending a "bunker party" (?)
- He says that he has never expressed an interest in her emotionally or physically
- He has never been any place outside of work with her alone. On one occasion, he recalls that while at dinner with his "significant other" and 2 other Citisteel employees, she was at the same restaurant and she came over to speak with them.

Jerry and I repeatedly asked Randolph if there was anything about his relationship with Terri that was other than professional. We emphasized to Randolph that if there were, he needed to "come clean" now.

We told Randolph that he was not in "Trouble" and also emphasized that Terri said she didn't want him fired and that would be "satisfied" if he only admitted he was "doing these things" and would stop.

Randolph repeatedly denied that he had done anything to harass or provoke Terri or to imply in any way that he had feelings for her. Randolph did admit that on occasion he has "raised his voice" with her at work over issues related to her performance and that on at least one occasion she was "visibly upset" by this.

For the record, I will state that the meltshop is a "loud" industrial environment and there are many times when voices are raised. Although some personnel are more sensitive to this, I don't think that anyone is "singled out" or treated differently by Randolph or other supervision.

When asked what may have provoked Terri to bring this complaint against him and now, Randolph could not provide an answer. When asked if there was any recent "tension" between he and Terri, he said that there was since she was upset just several days earlier when he asked her to do some work for the maintenance group.

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As a side note, just a week or two earlier, when I was with Randolph in the meltshop, I asked him to train Terri to download and print certain information from the Dranetz (furnace monitoring) computer on a daily basis. Randolph called Terri into his office to relay this to her and she walked away "disgustedly", saying that she did not have enough time and that this wasn't part of her job description.

I believe this is relevant to report since it may belie an underlying dissatisfaction with her job and work assignments.

After speaking with Randolph for about 45 minutes, we concluded the interview.

The next day (4/9) at approximately 9:15AM, Jerry, myself and Warren Bieger met with Randolph in Jerry's office.

We asked Randolph if he had given more thought to the claims and whether he could tell us anything new or different than what he told us the previous day. Randolph said no. He did not sleep very well and said that he mostly felt "hurt" that someone who he has helped would say these things about him. Randolph said that he helped her "boyfriend" (who he didn't realize was her boyfriend at the time), at her recommendation, get a job interview with IMS. Randolph said that if there were a tape of him that he would like to hear it.

We discussed possible options:

1. Ask Terri for more information/facts, such as the tape recording.
2. Remove Terri from the work environment so that she would not feel threatened.

Warren indicated that he was already planning to eliminate the clerical positions in both the meltshop and the plate mill. It was therefore decided that Terri would be allowed to go to work in Shipping where a clerk had just been hired (made full-time from temporary).

The meeting concluded about 10:00AM.

Jerry and I immediately met with Brett Weiss, the General Supv. Of Shipping to inform him of the decision that he would be gaining a second clerk and that she would start immediately.

Dennis Ford was asked to inform Terri (approx. 10:30AM) to meet Jerry (and Jim Ryan) in the personnel office.

At this point, I was no longer involved.

However, according to conversation with Jerry afterward, this meeting between Jerry, Jim and Terri did not go too well. Terri became upset and did not want to go to Shipping and made other demands. Jerry informed us that he asked Terri to leave and go home for the day and to return on Thursday (4/10) morning at 8:30AM to meet with him again.

At approximately 8:45AM on Thursday, Jerry called to tell me that Terri continued to be upset and "out of control" and that he again asked her to leave.

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EXHIBIT NO. 4

KWP 7-01-06

CITISTEEL USA INCORPORATED

SEXUAL HARASSMENT INVESTIGATION CHECKLIST

The following checklist and interview forms are provided to help you conduct a thorough investigation into any sexual harassment complaint.

- ☒ Consider the order in which investigation interviews will be conducted.
- ☒ Complainant.
- ☒ Alleged harasser.
- ☒ Co-workers and other witnesses. *No witnesses*
- ☒ Second interview of the Complainant to discuss any factual questions as a result of the investigation.
- ☒ Second interview with the ~~alleged harasser to discuss any factual questions as a~~ result of the investigation. *twice*
- ☒ Interview each witness separately in an office or room where the discussion will not be overheard by other witnesses, the alleged harasser, or any other unauthorized persons.
- ☒ Two managers should participate in the interview process. *JD + GB* At least one of the investigating managers should be thoroughly familiar with sexual harassment law and the Company's harassment policies and procedures. One manager should be designated as the interviewer, and the other should act primarily as a witness and take notes of the discussion. *JD + JWR.*
- ☒ Before beginning the interview, explain the purpose of the interview by referring generally to recent complaints about the relationship between the Complainant and the alleged harasser. Do not necessarily discuss the issue of sexual harassment, so that you do not taint the witness's recollection of the events.
- ☒ Emphasize that the Company takes these charges very seriously and that the Company is investigating these charges by interviewing all potential witnesses in compliance with Company policy.
- ☒ Explain that upon completion of the investigation, the Company will attempt to determine what occurred, and will take appropriate action based on its determination.

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- ☒ 12 Both the alleged victim and the alleged harasser should be advised that each will be apprised of the results of the investigation and any action taken.
- ☒ 13 Instruct each witness interviewed not to discuss the matters covered during the interview with any co-employee or the alleged harasser.
- ☒ 14 Explain to the witness that confidentiality is necessary to protect the integrity of the investigation and to ensure that the Company receives trustworthy information in an atmosphere free from coercion.
- ☒ 15 Avoid leading questions.
- ☒ 16 Ask open ended, non-judgmental questions. Use investigation interview forms where appropriate.
- ☒ 17 Explain to all witnesses that retaliation will not be tolerated.
- ☒ 18 Avoid the appearance of impropriety or favoritism in conducting interviews.
- ☒ 19 Observe and record all physical and verbal reactions of witnesses.
- ☒ 20 Do not record conclusions regarding credibility.
- ☒ 21 Avoid judgmental statements or furthering of myths or stereotypes.
- ☒ 22 Interview all possible witnesses:
- ☒ 23 Complainant.
 - ☒ 24 Alleged harasser. *RH*
 - ☒ 25 Complainant's supervisor. *CB*
 - ☒ 26 Alleged harasser's supervisor. *RH, DF*
 - ☐ 27 Co-workers. *N/A*
 - ☐ 28 Other. *N/A*

- ☒ 29 Review Complainant's personnel file.
- ☒ 30 Review alleged harasser's personnel file.

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- ☒ 31 Discuss investigation results and proposed action with investigation team. This discussion should be limited to those with a need to know the results of the investigation, such as the Complainant's supervisor, the alleged harasser's supervisor, and senior Human Resources Department staff.

JD, GB, RH, NB

- ☐ 32 Consider credibility determinations. Factors include:

☒ 33 Memory.

☒ 34 Perception.

☒ 35 Veracity (truthfulness). *weak*

☒ 36 Corroboration or lack of corroboration, and implications of such determination.

☒ 37 Bias of witnesses. *None N/A.*

☒ 38 Consistency of accounts. *inconsistent of complaint.*

☒ 39 Prior misconduct or lack thereof, and implications of such misconduct.

☒ 40 Plausibility of accounts.

☒ 41 Review any documentary evidence.

☒ 42 Consider appropriate remedial action:

☐ 43 Document investigation in personnel file.

☐ 44 Verbal warning.

☐ 45 Written warning.

☐ 46 Suspension.

☐ 47 Demotion.

☐ 48 Termination.

☒ 49 Factors in determining appropriate remedial action.

☒ 50 Credibility determinations.

☐ - *TRANSITION*

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☒ 51 Prior conduct, if any.☒ 52 Prior discipline of alleged harasser. IN PENDING☒ 53 Level of harassment, including type and frequency of conduct.☒ 54 Alleged harasser's knowledge of Company rules of conduct. SHE KNOWS RULES☒ 55 Prior disciplinary "precedent" for identical, similar or analogous misconduct. N/A☒ 56 Political considerations within the organization. N/A☒ 57 Public and employee relations issues. N/A☐ 58 Other:☒ 59 Review harassment investigation and findings.☒ 60 Was the Company harassment policy adequate? Yes☒ 61 Were the employees aware of the terms of the harassment policy. Yes☒ 62 Was the harassment complaint procedure adequate? Yes☒ 63 Did the investigator uncover other issues which need to be addressed? Yes☐ 64 Other:☒ 65 Implement changes to harassment policies and procedures where appropriate. - N/A

Complainant Interview Form

Name: TerrilynDate: 4/08/03Position: Client RepSupervisor: Alt, DF

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☒ 66 Name and position of the alleged harasser: R. HARRIS GS. Multispy

☒ 67 Date and time of the harassment: ongoing for 1 1/2 years

☒ 68 Did the harassment occur more than once? Yes alleged No ✓

If so, how often did it occur? unknown

If it occurred more than once, on what dates and at what times did it take place?

unknown - no real generalities

☒ 69 For each incident, ascertain and document what occurred. Try to get as many details as possible, even though this may be uncomfortable for the complainant. Use additional pages if necessary. Ask open ended, non-judgmental questions, such as:

• Did the alleged harasser touch the Complainant?

alleged touched cheek (stroked cheek)
and touched hair.

• If so, where was the Complainant touched?

cheek (zygoma) and hair.

• Was the Complainant touched more than once?

unknown alleges more than once
on the cheek.

• Did the alleged harasser threaten the Complainant in any way?

no not alleged except for
complaint saying she was written up just before this
allegation

• If so, what was the threat or threats?

N/A